

physical location of said network device; and

a network address in the network communications system, wherein the network address can be associated to the physical location of said network device so that the network address can be used in coordinating the designated function of said network device with the designated function of other network devices.

REMARKS

A. Rejection Under 35 U.S.C § 112

Applicant has amended claim 21 to overcome the rejection under 35 U.S.C. § 112. Applicant contends that claim 21 is now in condition for allowance.

B. Rejections Under 35 U.S.C. § 103

In the discussions with the examiner on 23 April 2003, the examiner suggested that the breadth of the claims could be interpreted to cover areas unintended by the applicant, possibly causing further issues under 35 U.S.C. 103. In light of these discussions, applicant has revised the claims 1, 8, 9, 11, and 21 and has removed claims 6, 7, and 10 to address the examiner's concern. Applicant believes that claims 1, 8, 9, 11, and 21 are now in condition for allowance.

In the Office Action dated 30 January 2003, claims 1-27 have been rejected under 35 U.S.C. §103 as being unpatentable over *Glorikian* in light of *Fukui*. Applicants respectfully traverse this rejection and request that this rejection to the claims be removed.

In order for it to be obvious to use the *Glorikian* reference in combination with the *Fukui* reference, there must be a suggestion, at the time of the invention, to combine these two

references. Applicants respectfully contend that a person of ordinary skill in the art would not have combined these references because they are from different fields. *Glorikian* describes the identification of the wireless location of cellular devices and *Fukui* describes the wiring structure of video devices on seats in an airplane. As the examiner notes in the office action when discussing claims 1, 11, and 21, *Glorikian* does not disclose the use of the physical location as an address in a network communications system. The examiner then suggests that *Fukui* discloses an automatic configuration system that maps a device address to a physical location. Applicant respectfully transgresses the examiner's interpretation of *Fukui*. *Fukui* configures its physical location from a manually entered wiring map, as seen in *Fukui* Fig 3 and Col 5, lines 10-25. As such, the physical location is manually entered. Furthermore, *Fukui* does not disclose or even suggest that each device has a designated function and the network address identified by the physical location can be used in coordinating the designated function as claimed.

For the above reasons, claims 1, 11 and 21 are distinguishable over the cited *Glorikian* and *Fukui* references.

Claims 2-5, 12-20, and 22-27 are dependent, directly or indirectly, on claims 1, 11 and 21, respectively; and recites features not recited in claims 1, 11 and 21. Therefore, based on at least the same reasons regarding claims 1, 11 and 21 above, claims 2-5, 12-20, and 22-27 are also distinguishable over the cited *Glorikian* and *Fukui* references.

Applicant respectfully traverses the examiner's contention that *Fukui* discusses a programmable logic controller or and I/O system associated with a programmable logic controller. Neither of these devices can be found in this reference. Therefore, applicant contends that Claims 8 and 9, as amended into independent form and with the additional changes, are not obvious in light of *Fukui*. Thus, claims 8 and 9, as amended, are distinguishable over the cited *Glorikian* and *Fukui* references.

CONCLUSION

Applicant has deleted claims 6, 7 and 10 and amended claims 1, 8, 9, 11 and 21. Accordingly, applicant submits that claims 1-5, 8, 9, and 11-27 claim matter that is distinct from the prior art and requests that the rejection under 35 U.S.C 103 be withdrawn.

With the submission of this Amendment, this application is in condition for further examination and early consideration of the claims at issue and early allowance is hereby requested.

A marked up version of the amended claims is shown in Exhibit A.

Respectfully submitted,



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Exhibit A

Marked-up Version

1. (Amended) A method of [communicating with a device] communication in a network communications system, the communications system comprising a plurality of network devices, wherein [the] each network device is positioned at a physical location and wherein each network device is adapted to perform a designated function according to the physical location of said each network device, said method comprising the [step]steps of:

identifying the physical location of [the] said each network device using a physical site locator; and

associating [so that] the identified physical location [can be used as an] to a network address [of the device] in the network communications system, so that the network address associated to said each network device can be used in coordinating the designated function of said each network device with the designated function of other network devices in the network communications system.

8. (Amended) A method of communicating with a plurality of devices in a network communications system wherein each device is positioned at a physical location, said method comprising the step of converting a map of the physical locations of the devices into one or more address tables, each table including a plurality of network addresses for routing messages to the devices, wherein at least one of the devices comprises [The method of claim 7, wherein each device comprises:] a programmable logic controller having a network address assigned thereto [to communicate with the controlling station; and] from said address table, and the physical locations of at least some of the devices are identified by a physical site locator [to identify the physical location of the respective device].

9. (Amended) A method of communicating with a plurality of devices in a network

communications system wherein each device is positioned at a physical location, said method comprising the step of converting a map of the physical locations of the devices into one or more address tables, each table including a plurality of network addresses for routing messages to the devices, wherein at least one of the devices comprises [The method of claim 7, wherein each device comprises:] an I/O device of a programmable logic controller system having a network address assigned thereto [to communicate with the controlling station; and] from said address table, and the physical location at least some of the devices are identified by a physical site locator [to identify the physical location of the respective device].

11. (Amended) A network communications system comprising a plurality of network devices positioned at a plurality of physical locations, wherein each network device is adapted to perform a designated function according to the physical location of said each network device, said system comprising:

means for identifying the physical location of [the devices] said each network device using a physical site locator; and

means for associating the identified physical location to a network address of the network communications system so that [each of the physical locations] network address associated to said each network device can be used [as an address of a respective device in order to allow the devices to communicate with each other in the communications system] in coordinating the designated function of said each network device with the designated function of other network devices.

21. (Amended) A network device located at a physical [site] location in a network communications system, the network communications system comprising a plurality of other network devices located at a plurality of other physical locations, wherein the other network devices are adapted to perform one or more designated functions, and wherein the system

comprises means for identifying the physical site location of said network device using a physical site locator, said network device comprising:

means for performing a function designated to said network device according to the physical location of said network device; and

a network address in the network communications system, wherein the network address can be associated to the physical location of said network device so that the [physical site location] network address can be used [as an address for communicating with other devices in the communications system] in coordinating the designated function of said network device with the designated function of other network devices.